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**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:

SHAPES/ARCH HOLDINGS L.L.C., et al.,
Debtors.

Chapter 11

Case No. 08-14631 (GMB)
(Jointly Administered)

Hon. Gloria M. Burns, U.S.B.J.

**REQUEST OF ZHONGSHAN HUA FENG LOCK PRODUCTS CO., LTD. FOR
ALLOWANCE AND PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM**

Zhongshan Hua Feng Lock Products Co., Ltd. (“Hua Feng”), by and through its undersigned counsel, as and for its Request for Allowance and Payment of Administrative Expense Claim (the “Request”), states as follows:

Summary of Request

1. Hua Feng requests allowance and payment of an administrative expense claim, pursuant to 11 U.S.C. §§ 507(a) and 503(b), for product shipped by Hua

Feng to the one of the Chapter 11 debtors herein, Ultra L.L.C. (“Ultra”), as more particularly described herein. In total, and as set forth on Exhibit “A,” Hua Feng requests allowance and payment of an administrative expense claim of \$389,560.44.

Background

2. On March 16, 2008 (the “Petition Date”), Ultra and its affiliated debtors (collectively, the “Debtors”) filed voluntary petitions under Chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”).

3. On March 18, 2008, the Court entered an Order Pursuant to Sections 105(A), 362, 503(b) and 507 of the Bankruptcy Code (I) Confirming the Grant of Administrative Expense Status to Obligations Arising From the Postpetition Delivery of Goods, (II) Establishing Authority to Pay Certain Expenses in the Ordinary Course of Business and (III) Prohibiting Third Parties From Interfering with the Delivery of Goods to the Debtors (the “Administrative Expense Order”).

4. On April 1, 2008, the Office of the United States Trustee appointed an Official Unsecured Creditors’ Committee in the Debtors’ bankruptcy cases (the “Committee”).

5. On April 7, 2008, Hua Feng served upon the Debtor’s counsel and upon Epiq Bankruptcy Solutions, LLC, the Debtor’s claims agent, a demand for reclamation of goods pursuant to section 546(c) of the Bankruptcy Code (the “Reclamation Demand”). Pursuant to the Reclamation Demand, Hua Feng requested reclamation with respect to product provided to Ultra immediately prior to the Petition Date and expressly reserved its rights to assert an administrative expense claim

pursuant to section 503(b) of the Bankruptcy Code and the Administrative Expense Order.

Relief Requested

6. Through this Request, and as detailed on Exhibit “A,” Hua Feng seeks allowance and payment of a claim arising from (i) Hua Feng’s supply of product to Ultra within twenty (20) days prior to the Petition Date, pursuant to section 503(b)(9) of the Bankruptcy Code, and/or (ii) Hua Feng’s supply of product to Ultra that was received by Ultra subsequent to the Petition Date, pursuant to the Administrative Expense Order.

7. As is more specifically detailed on Exhibit “A,”¹ Ultra received from Hua Feng four (4) shipments of product, having a value of \$253,481.64, during the twenty (20) day period prior to the Petition Date. Pursuant to Section 503(b)(9) of the Bankruptcy Code, Hua Feng submits that it is entitled to have this claim allowed and paid as an administrative expense claim.

8. Additionally, as is more specifically detailed on Exhibit “A,” Ultra received from Hua Feng two (2) shipments of product, having a value of \$136,078.80, which were received by Ultra after the Petition Date. Pursuant to the Court’s Administrative Expense Order, Hua Feng submits that it is entitled to have this claim allowed and paid as an administrative expense claim.

¹ Supporting documentation will be provided upon request.

CONCLUSION

WHEREFORE, for all the foregoing reasons, Hua Feng respectfully requests that its Request for Allowance and Payment of Administrative Expenses be granted in full in an amount not less than \$389,560.44.

DATED: May 29, 2008

RIKER, DANZIG, SCHERER, HYLAND
& PERRETTI LLP

By: /s/ Joseph L. Schwartz
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Attorneys For Zhongshan Hua Feng Lock
Products Co., Ltd.

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EXHIBIT A

Detail of Zhongshan Hua Feng Lock Products Co., Ltd. Administrative Claim

PO #	Invoice #	Shipped Date	Rec'd Date	Invoice Amount
8009279-8009508	EX08022202	2/23/2008	2/25/2008	\$ 2,943.84
8009079-8009279-8008239-8009344-8009303	EX08011701	1/22/2008	2/26/2008	\$ 97,654.80
8009576-8009522	EX08012901	2/4/2008	2/29/2008	\$ 60,393.12
8009279-8009280-8009344-8009303-8009408	EX08012403	1/31/2008	3/5/2008	\$ 92,489.88
	Subtotal of 503(b)(9) Administrative Claim			\$ 253,481.64
8009408-8009412-8009448-8009508	EX08012601	2/1/2008	3/27/2008	\$ 68,603.52
8009279-8009344-8009408-8009448-8009508-8009509-8009338-8009340-8009417-8009345	EX08012908	2/2/2008	3/28/2008	\$ 67,475.28

Subtotal of Administrative Claim Pursuant
to Administrative Expense Order \$ 136,078.80

Total Administrative Claim \$ 389,560.44

NOTE: Invoices available upon request.